

December 3, 2024

Crystal Henwood
Regulatory Affairs Officer/Clerk
Nova Scotia Utility and Review Board
1601 Lower Water Street, 3rd Floor
P.O. Box 1692, Unit "M"
Halifax, NS B3J 3S3

Re: M11927 – CI 50518 – HYD – Ruth Falls Main Dam Refurbishment ATO – IR Responses

Dear Ms. Henwood:

Enclosed are Nova Scotia Power Inc.'s (NS Power, Company) responses to information requests (IRs) pertaining to the capital item referenced above.

NS Power received IRs from the Consumer Advocate, Industrial Group, Midgard Consulting Inc., the Nova Scotia Utility and Review Board, and the Small Business Advocate on November 12, 2024.

Request for Confidentiality

Pursuant to Rule 12 of the Board Regulatory Rules, NS Power requests confidential treatment of the below noted IRs. NS Power's support for its request is provided below in accordance with Rule 12(4):

Consumer Advocate	Confidentiality	Justification
IR-3	Partially Confidential	Third Party
IR-12	Partially Confidential	Third Party
IR-13	Partially Confidential	Third Party

Industrial Group	Confidentiality	Justification
IR-9	Partially Confidential	Third Party

Midgard Consulting	Confidentiality	Justification
IR-2	Partially Confidential	Third Party
IR-5	Partially Confidential	Third Party
NSUARB	Confidentiality	Justification

IR-10	Partially Confidential	Third Party
IR-11, Attachment 1	Confidential	Third Party Commercial
IR-11, Attachment 2	Partially Confidential	Third Party Commercial
IR-11, Attachment 3	Confidential	Third Party Commercial
IR-12, Attachment 14b	Confidential	Third Party

Small Business Advocate	Confidentiality	Justification
IR-3	Partially Confidential	Third Party

Commercial Information

The Company requests that the NSUARB accept the above noted Information Requests and Attachments as confidential. Confidentiality was applied to costs associated with proposals received from vendors.

To protect value for customers and mitigate the risk of prospective proponents having access to the information itemized above, and to maintain good business relations with vendors, this information is confidential on the basis on commercial sensitivity.

The more a supplier is aware of NS Power's specific requirements and a competing vendor's costs, the better the supplier's ability to obtain the highest price, reduce competition and ultimately increase the cost for NS Power and its customers. The cost of such transparency is not always immediately evident. Information from regulatory proceedings can provide competitive advantages over other suppliers, and that could be advantageous in bidding or negotiation. Higher prices, or avoidable contractual constraints, will result in unnecessary higher costs to customers.

NS Power seeks to keep the terms and conditions of suppliers' pricing and arrangements confidential from their other customers or potential competitors. This prevents competitors from using the information to gain a competitive advantage. NS Power also desires to protect its ability to acquire services and equipment on the most competitive terms, as those "best" terms may not be available if there is a risk that they will be disclosed to the customers or competitors of the supplier.

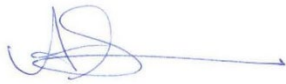
Since NS Power customer rates are cost-based, the maintenance of confidentiality for these items is to the direct benefit of customers.

Third Party Information

NS Power is a party to confidentiality agreements and, as such, the associated third parties have a reasonable expectation that the information noted as third party confidential will not be made available on the public record. In addition to this, outside of these express agreements, third parties have flagged their information as commercially sensitive and have indicated that confidential treatment of this information is required.

Based on the justifications described above, NS Power requests confidential treatment of the above referenced documents.

Kind regards,

A handwritten signature in blue ink, appearing to read 'AS', with a long horizontal line extending to the right.

Annie Beth Sampson
Manager, Regulatory
Encl.